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July 20, 2000

Director Special Nutritionals Center for Food Safety and Applied Nutrition FDA 200 C Street S.W. Washington, DC 20204



RE: HEALTHY HAIR, SKIN & NAILS

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **Andrew Lessman's HEALTHY HAIR, SKIN & NAILS**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

Andrew Lessman's HEALTHY HAIR, SKIN & NAILSTM is a unique combination of nutrients, herbs and phytochemicals specifically designed to support and maintain the growth of healthy hair, skin and nails. The physical and chemical structures of hair, skin and nails are all very similar and require much the same nutrients to grow and remain healthy. The hair, skin and nails are primarily comprised of specialized proteins such as keratin, collagen and elastin. Collagen, keratin, elastin and other tissue proteins owe their unique properties to the sulfur bonds (disulfide linkages) that hold them together. Because sulfur is so important for the structure of these tissues, we provide high levels of Methylsulfonylmethane (M.S.M.), which is an exceptional source of organic sulfur. We also include two sulfur containing amino acids, Cysteine and Methionine, to support and maintain the structure of these proteins. To provide essential vitamin support, we also include Vitamin C and all of the B-vitamins, with particular focus on the B-complex co-factors, Choline, Inositol and PABA, plus Vitamins A and D, because they are essential and required for the growth and maintenance of these tissues. Lastly, we provide the herb Horsetail as a natural source of silica, which is necessary for the healthy structure of these tissues. We give a great deal of attention to our hair, skin and nails when they are on the outside of our body (after they've grown), but this formula goes one step further, supporting these vital tissues on the inside of our body while they are being created and growing.

Respectfully Submitted,

Rob Maltas

Director, Product Development

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